

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OHIO
EASTERN DIVISION

PFG VENTURES, L.P.,)	
)	CASE NO. 1:21-cv-02205-JPC
Plaintiff,)	
)	JUDGE J. PHILIP CALABRESE
v.)	
)	
BKEN, INC. et al.,)	
)	
Defendants.)	
<hr/>		
PFG VENTURES, L.P.,)	
)	CASE NO. 1:22-cv-01177-JPC
Plaintiff,)	
)	JUDGE J. PHILIP CALABRESE
v.)	
)	
BRANDON C. KENNEDY, ET AL.,)	
)	
Defendants.)	

PLAINTIFF’S MOTION FOR ADMISSION *PRO HAC VICE* OF JAMES M. SUSAG

Pursuant to Local Rule 83(h), Plaintiff, PFG Ventures, L.P. (“Plaintiff”), through the undersigned counsel, respectfully requests that the Court admit the following counsel *pro hac vice* for the limited purpose of appearing and participating in the above-captioned case as co-counsel for Plaintiff.

James M. Susag, Esq. (Minnesota State Bar No. 0261038)
LARKIN HOFFMAN
8300 Norman Center Drive, Suite 1000
Minneapolis, MN 55437
Telephone: 952.896.1572
Facsimile: 952.842.1767
Email: jsusag@larkinhoffman.com

Mr. Susag is an attorney with Larkin Hoffman and is admitted to practice before and is a member in good standing of the state courts of Minnesota, Wisconsin and Washington. He is also admitted to practice in the U.S. District Court, District of Minnesota, the U.S. District Court,

Western District of Wisconsin, the U.S. District Court, Northern District of New York, the U.S. Court of Appeals, 4th Circuit, the U.S. Court of Appeals, 7th Circuit, and the U.S. Court of Appeals, 8th Circuit.

In further support of this motion, Plaintiff states that a declaration from Mr. Susag reflecting his current good standing and other information required by the Court's Local Rules is being filed simultaneously with this motion. The required filing fee will be submitted with the filing of this motion as well.

For the foregoing reasons, the undersigned counsel requests that James M. Susag, Esq., be admitted for the limited purpose of appearing and participating in this case as co-counsel for Plaintiff. A proposed Order is attached hereto.

Respectfully submitted,

/s/ Chelsea R. Mikula

Chelsea R. Mikula (0086453)

Ariana E. Bernard (0100001)

TUCKER ELLIS LLP

950 Main Avenue, Suite 1100

Cleveland, OH 44113

Telephone: 216.592.5000

Facsimile: 216.592.5009

E-mail: chelsea.mikula@tuckerellis.com
ariana.bernard@tuckerellis.com

Nicholas B. Clifford, Jr. (admitted *pro hac vice*)

Missouri State Bar No. 44477

TUCKER ELLIS LLP

100 South 4th Street, Suite 600

St. Louis, MO 63102

Telephone: 314.256.2550

Facsimile: 314.256.2549

Email: Nicholas.Clifford@tuckerellis.com

Attorneys for Plaintiff PFG Ventures, L.P.

CERTIFICATE OF SERVICE

A copy of the foregoing was filed electronically on January 5, 2023. Service of this filing will be made pursuant to Civ.R. 5(B)(2)(f) and Civ.R. 5(B)(3) by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Chelsea R. Mikula

Chelsea R. Mikula (0086453)

One of the attorneys for Plaintiff